



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East-7th Floor
Brooklyn, N.Y. 11201*

August 17, 2016

BY ECF

Honorable Denis R. Hurley
United States District Court
100 Federal Plaza
Central Islip, New York 11722-9014

Re: *Perez v. Local 1181, Amalgamated Transit Union, 15-CV-0665 (DRH)(GRB)*

Dear Judge Hurley:

This Office represents plaintiff Thomas E. Perez, Secretary of Labor, in the above referenced action. We write on behalf of the parties to submit the attached Stipulated Settlement Agreement and proposed Order (the "proposed Order") for the Court's approval.

As set forth in greater detail in the proposed Order, and subject to the Court's approval, Local 1181-1061, Amalgamated Transit Union, would conduct and complete its next scheduled election of officers by December 15, 2016, under the supervision of the Secretary of Labor. After completion of the supervised election, the Secretary of Labor would certify to the Court the names of the persons so elected and that such election was conducted in conformity accordance with Title IV of the Labor-Management Reporting and Disclosure Act of 1959, 29 U.S.C. §§ 481-84. Upon approval of such certification, the Court would enter a final judgment declaring that such persons have been elected as shown by such certification, resolving the above referenced action.

We are in receipt of the August 9, 2016 letter submitted by Levy Ratner, P.C., counsel for the complainant Thomas Salerno. Although the complainant is not a party to this action, this Office will forward a courtesy copy of the attached Stipulated Settlement Agreement and proposed Order to complainant's counsel.

We thank the Court in advance for its consideration.

Very truly yours,

ROBERT L. CAPERS
United States Attorney

By: /s/ John Vagelatos

JOHN VAGELATOS
Assistant U.S. Attorney

Att.

Perez v. Local 1181, 15-CV-0665 (DRH)(GRB)
Letter to the Honorable Denis R. Hurley dated August 17, 2016

cc: Richard Neil Gilberg (By ECF)
Robert Marinovic (By ECF)
Richard A. Levy (By Electronic Mail and Facsimile)
Richard Dorn (By Electronic Mail)